

Mary Macleod MP written submission to the Night Flying Restrictions at Heathrow, Gatwick and Stansted Stage 2 Consultation – January 2014

I would like to commend the Department for Transport (DfT) for attempting to make this consultation less technical in nature than Stage 1, allowing the opportunity for broader comment from residents. However, I would also suggest that the very nature of any Government consultation may still prove to be off-putting to local residents. I would therefore encourage the Department to consider wider sources of input from local residents than simply direct responses to this document.

As the Member of Parliament for Brentford & Isleworth, I represent the views of more than 100,000 residents, many of them living directly under the flight paths at Heathrow, therefore I make my comments in this context.

There is no doubt that the noise from night flights is one of the most disturbing aspect for residents living near to Heathrow and many local residents feel very strongly about this. I spoke at length on this subject in my Westminster Hall debate on Night Flights at Heathrow on 24th May 2011.

In my response to this consultation, I have attempted to represent the views and feelings of the many hundreds of local residents with whom I have discussed this issue or who have contacted me directly with their experiences. In a recent Residents' Survey sent out to everyone in my constituency more than 50% of respondents said that they are disturbed by the noise of night flights.

In its online consultation on Heathrow, the London Borough of Hounslow found that 83% of respondents are in favour of a ban on night flights between 23:00 and 07:00 and 94% want better noise insulation for schools and residents living under the flight paths. I would urge the DfT to consider these wider findings from those most affected by the noise of night flights at Heathrow as part of their consultation.

In my submission to the Stage 1 consultation I called for an operational ban on night flights during the night quota period (23:30 to 06:00) as a minimum, a new approach to measuring night noise in line with global best practices, the introduction of planned runway alternation during the period between 06:00 and 07:00 and improved noise mitigation for local residents. I am disappointed to note that these recommendations have not been taken on board in the Stage 2 proposals.

The main proposal in the Stage 2 consultation is to extend the present restrictions to 2017, with some minor changes, but with no reduction in the permitted number of noise quota points. I regard this proposal as unacceptable for a number of reasons:

- The Aviation Policy Framework, published in March 2013, stated its overall objective on noise is to “limit, and, where possible, reduce the number of people in the UK significantly affected by aircraft noise”. I do not believe the proposals in Stage 2 make any significant progress towards this objective.
- The Government stated in its last review of night restrictions that night flights would comply with World Health Organisation (WHO) regulations in stages by 2030. Again, this proposal does not allow for any significant progress towards this goal.
- The present system of restrictions was introduced in 1993 with the objective of delivering incremental improvements in the night noise climate, and all previous reviews of the restrictions have resulted in reductions in the noise quota points.

- Residents have a legitimate expectation that, in the absence of a ban on night movements, at least the long-term policy of reducing the noise quota points will be adhered to.
- The Government itself argued before the European Court of Human Rights that restrictions on night flights should be reviewed and tightened on a regular basis.

In the detail of my response below I have addressed the specific questions raised in the Stage 2 consultation. In summary, my recommendations are:

1. Implement a revised night flights regime ahead of the suggested timetable in 2017 (without waiting for the final recommendations from the Airports Commission).
2. Follow the lead set by Frankfurt and Zurich and implement an operational ban on all night flights during the night quota period from 23:30 to 06:00.
3. Maintain existing runway alternation and extend runway alternation to include some planned respite during the currently unregulated period between 06:00 to 07:00.
4. Prior to the operational ban taking effect, conduct a trial into an increased continuous angle of descent and other measures that could help to reduce night noise to WHO targets by 2030. (This could include concentrating existing flights between 05:30 and 06:00 to reduce the number of very early flights that initially wake residents).
5. Maintain the existing night flight cap at Heathrow prior to the operational ban taking effect, preventing any additional night flights – residents should not be expected to tolerate any worsening in the current situation.
6. Implement a new model for measuring night noise that includes a range of measures reflecting average noise, frequency and number of flights.
7. Implement an operational ban on the noisiest planes (with a noise quota of QC/2 and above) during the night quota period and for planes of QC/4 and above during the shoulder period.
8. Review noise mitigation approaches and ensure adherence to consistent international standards of best practice.
9. Implement additional noise monitors at Heathrow, including some that are further away from the airport.

Question 1: Do you agree with our preliminary view as to the new studies on health effects?

I agree there are uncertainties on whether existing research is sufficient to prove the causality between aircraft noise and the health of local residents and I support on-going research and evaluation of these studies. However, I would argue that there is now such a body of medical research now accumulated globally that this should be an issue to be taken extremely seriously by the Department, with future detailed research projects undertaken as a matter of urgency.

The issue needs to be set in the context of the WHO guidelines that say the sleep period should be at least 8 hours for most people and the widely accepted fact that the existing noise levels at night are too high and are decreasing too slowly. Given the fast population growth in the southeast, increasing numbers of people will be affected – even if the existing levels of noise are maintained.

Question 2: Do you have any further views on the costs and benefits, including health impacts, which we should take into account in our decision?

In July 2004 the Department for Transport gave the following commitment regarding achieving the WHO targets for night flights by 2030:

“The guideline values are very low. It would be very difficult, if not impossible, to achieve them in the short to medium term without draconian measures - but that is not what the WHO proposed. The recommendation was that the Guidelines for Community Noise should be adopted as long term targets for improving human health. This is also consistent with the advice above. The UK Government is committed to take account of this. In respect of aircraft noise at night, the 30 year time horizon of the White Paper provides a suitable parameter for ‘longer term’.”

Source: Night Flying Restrictions at Heathrow, Gatwick and Stansted: Stage 1 of Consultation on Restrictions to apply from 30 October 2005 (July 2004), paragraph 3.12). The 30 year time horizon of the White Paper ran to 2030.

I believe a night quota period ban should be an option presented for consideration and is likely to be the only approach that will ultimately lead to the WHO noise targets being achieved. I would like to see a defined timetable towards the achievement of this night quota period ban, using incentives and restrictions to support this.

Night Flight benefits: In my response to the Stage 1 consultation, I referred to the imbalance between the supposed benefits from night flights as compared to the cost.

“On average there are 15.7 flights arriving or departing during the night quota period at Heathrow. The average occupancy of planes at Heathrow is around 74% and the predominant aircraft in use during the night period is the B747-400 (with a capacity of 345), which equates to around 4,000 passengers per day. And yet, for the supposed extra convenience of less than 4,000 people per day, at least 750,000 people around Heathrow are impacted by the noise of these flights – this equation just doesn’t add up!”

Question 3: Do you agree with the proposed environmental objectives?

I have a number of comments to make on the proposed environmental objectives listed in paragraph 4.4:

- Specific targets should be defined relating to objective 1 so that the number of people and degree to which they are affected by aircraft noise can be managed with a view to achieving significant reductions in line with the achievement of the WHO directive.
- I do not agree with the use of the 55dB contour as the sole measure for the achievement of objective 1. Measures need to be defined to take into account not only average noise energy, but also the number of flights, the noisiest aircraft, the noise frequency level and the number of people affected. Value must also be given to periods of uninterrupted respite and the general pattern of interruption.
- Objective 2 relating to the sleep disturbance caused by the noisiest types of aircraft should also include measurement of QC/2 aircraft. As suggested in my response to Stage 1, I believe we should implement an operational ban on all planes with a noise quota of QC/2 and above during the night quota period.
- I believe that we should take every opportunity to reduce the impact of aircraft noise and do not agree that this would jeopardise the conclusions of the Airports Commission. Therefore I do not agree that it is necessary to maintain the current regime in relation to night flights at Heathrow pending the outcome of this team, as suggested in objective 3.

Question 4: Do you agree that the next regime should last until October 2017?

As stated in my response to Question 3, I believe the link to the Airports Commission Final Report in 2015 is not relevant and that decisions on a meaningful reduction in noise impact should not be postponed until after a general election in May 2015. I would like to see the Heathrow regime revised in time for further consultation and decision before the general election in 2015 and implementation no later than October 2015 for a five year term.

Question 5: Do you have any views on the revised dispensations guidance?

I broadly agree with the revised dispensations guidance allowing action to be taken to address major delays at the airport. However, I am strongly opposed to the suggestion in paragraph 4.22 that existing flights in the early morning arrival period could be redistributed thus permitting an increased number of arrivals before 06:00 in order to reduce the use of both runways for arrivals in the early morning period.

The noise improvement resulting from uninterrupted alternated respite between 06:00 and 07:00 will be more than offset by the extra movements and consequential noise before 06:00. I believe the issue should instead be addressed by more effective management of the flow of planes arriving in the stacks and smoothing the slots scheduled during the day to relieve pressure in the early morning.

Question 6: Do you agree that we should maintain the existing movement and noise quota limits until October 2017? If not, please set out your preferred options and reasons – this could include the noise and economic impact of any alternatives.

No – I believe existing movement and noise quota limits should be reduced as outlined in my response to Question 1.

Question 7: Do you have any comments on our forecasts to October 2017?

Heathrow has considerable spare passenger capacity (currently around 70 mppa compared to 90 mppa capacity). Every effort should be made to increase the current loads of aircrafts to increase the number of passengers through the airport whilst maintaining the existing flight cap of 480,000 ATMs. In the Airport Commission's Interim Report last December forecast loads were increased above those previously used in the DfT model and this revision will need to be reflected in the DfT forecasts.

In addition, as stated previously, I support the investigation into daytime smoothing as a means to facilitate a night quota period ban.

Question 8: Do you have any views on how the benefits of quieter aircraft can be shared in future between communities living close to the airport and the aviation industry?

This is a difficult issue for local residents as their experience historically has been that any benefits achieved by reductions in aircraft noise have been more than offset by an increase in aircraft movements. In order to be considered fairly, we must first have new measures of aircraft noise in place to accurately reflect the level of noise disturbance being experienced by residents.

Question 9(a): Do you agree with extending the operational ban of QC/8 and QC/16 aircraft to the entire night period (23:00 – 07:00)?

Yes, but I would also like to see an operational ban brought in during this time for QC/4 aircraft and an operational ban brought in for QC/2 aircraft during the night quota period (23:30-06:00).

Question 9(b): Do you agree with our assessment of the costs and benefits in the draft IA?

No. Please see my response to Question 2.

Question 10: Are there any other changes to the regime which we should consider?

In the absence of an immediate ban on night flights, I believe the minimum acceptable approach would be a phased noise reduction plan in order to achieve WHO targets by 2030. One proposal I would support in this regard would be to concentrate the 16 arrivals in the Quota Period in the half hour between 05:30 and 06:00.

Scheduled movements by QC/4 aircraft are currently banned 23:00-06:00 but operational movements are permitted. I propose that all movements by QC/4 aircraft should be banned between 23:00-07:00.

Scheduled and operational movements by QC/2 aircraft are currently permitted between 23:00-07:00. I propose a ban on scheduled QC/2 movements between 23:00-07:00 and an operational ban between 23:30-06:00.

Question 11: Do you have any further comments on the scope for trialling new operational procedures which have potential noise reduction benefits in the period up to 2017?

I support the use of trials in principle but there should be much greater clarity in design of the trials and improved communication with communities as to nature and timing of trials. I oppose trials that include more arrivals before 06:00 due to the impact on peoples' sleep.

Question 12: Are there any other matters you think this consultation should cover?

I would like to see a full review of noise mitigation standards, with internationally-accepted best practice standards being implemented at all UK airports, including Heathrow.

Question 13(a): Do you agree with the locations of the proposed new noise monitors at Heathrow? If not, are there alternative locations you would favour and why?

Yes, I agree that additional noise monitors should be put in place. I would also like to see some noise monitors in place further away from Heathrow so that the noise levels can be measured here too. I receive a number of complaints about being woken early in the morning from aircraft from people living much further away from Heathrow than would be predicted by the current assessment of those people who are disturbed by noise. I would like to see this noise level objectively measured so that it can feed into any operational improvements that can be made into flight arrivals and departures for all affected Londoners.

Question 13(b): Do you agree with the proposal to apply runway-specific limit adjustments for easterly departures at Heathrow? If not, please give reasons.

I agree that during a transition phase towards an operational ban on night flights during the night quota period it would be appropriate to consider how best to route flights to affect the minimum number of people. This could include changing the current pattern of alternation in favour of an easterly preference during the night quota period. Planned periods of respite for particular communities must also be incorporated into any new system.